

[Submitting counsel below]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION,

This Document Relates to:

*Jaylynn Dean v. Uber Technologies, Inc., et al.*, No. 3:23-cv-06708

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER GRANTING  
DEFENDANTS' MOTION TO STRIKE  
DR. MINETTE DRUMWRIGHT'S  
UNDISCLOSED EXPERT OPINIONS**

Judge: Hon. Charles R. Breyer  
Courtroom: Courtroom 6 – 17th Floor

Date Filed: January 15, 2026

Trial Date: January 13, 2026

**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA  
PHOENIX DIVISION**

JAYLYNN DEAN,

Plaintiff,

v. UBER TECHNOLOGIES, INC., et al.,

Defendants

CASE NO. 25-cv-4276-PHX-CRB

Judge: Hon. Charles R. Breyer  
Courtroom: 501

Having considered Defendants' January 15, 2026 Motion to Strike Dr. Minette Drumwright's Undisclosed Expert Opinions, and Plaintiff's response thereto, the Court hereby **GRANTS** the Motion and **ORDERS** that Dr. Drumwright's undisclosed expert testimony and

exhibits be stricken from the trial record, including but not limited to the following topics, excerpts, and trial exhibits:

Undisclosed Expert Testimony Topic	Transcript Citations and Admitted Trial Exhibits
Uber Prioritized Growth Over Safety	Tr. 322:19–21; 323:10–14; 330:14–22; 333:2–3; 333:24–334:2; 335:2–3; 334:16–19; 334:23–335:12; 340:1–4; 348:2–10; 350:3–5; 350:8–351:23; 360:5–12; 361:14–19; & 363:22–364:4;  Exs. P-00176; P-01572; & P-04506
The “Sticky” Nature of Uber’s Corporate Culture	Tr. 349:10–19, 346:16–19, 347:6–13, 349:21–350:1, 350:4; 363:15–21; 363:24–364:1
RideCheck “Does Nothing”	Tr. 405:2–8; 406:25–407:3; 407:4–13
Driver Cancellation As A Risk Factor	Tr. 380:16–21
Targeting Hispanic riders in Phoenix	Tr. 397:19–398:9
Uber’s Safety Report Was Not “Novel”	Tr. 389:14–390:3
Consumer Recall of “Themes” Versus “Ads”	Tr. 378:4–9

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

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Hon. Charles R. Breyer  
United States District Judge